

Memorandum

Date: April 14, 2023

To: West Linn Planning Commission

From: John Floyd, Associate Planner

Subject: Clear & Objective Code Compliance Project – Work Session #4

Background and Purpose

The April 19th work session is the fourth scheduled meeting to discuss and receive feedback on draft text amendments related to the Clear & Objective Code Compliance Project. The goal of the meeting is to resolve any outstanding questions or concerns by commissioners prior to initiation of the public noticing and public hearing processes.

Focus of Work Session #4

The focus of the meeting is to present and discuss revisions prepared in response to feedback provided at the first three work sessions. Affected chapters are attached and labelled Revised Planning Commission Draft – 04.14.23. The prior draft was published as part of the February 15th Planning Commission packet, which can be found [here](#).

As before, new language is underlined and deletions are ~~struck-through~~, with changes marked in **red font**. To aid the Planning Commission in identifying new commentary, the new text has been **highlighted**.

Planning Commission Feedback and Follow-Up

At the March 15th work session, staff confirmed the list of final questions and concerns from the Planning Commission. In response, staff and the project consultant have done the following:

- Revised the proposed definition of family to more closely align with that used by the US Department of Housing and Urban Development (HUD), which defines a family as one or persons, related or unrelated. See page 11 of the April 14th Planning Commission Draft.
- Obtained written guidance from the City Attorney's office regarding document versioning in the CDC. See attached memorandum from City Attorney's office, dated 04.13.23.
- Commissioned a memorandum from Kittelson & Associates providing background and clarification on the Transportation Planning Rule (TPR), Transportation System Plan

(TSP), and project related Transportation Impact Analysis (TIA). A representative of Kittelson will be available for questions at the meeting.

- Commissioned a memorandum from MIG-APG identifying the standards in the CDC being replaced with references to the public works design standards. See attached memo dated April 13, 2013.
- Revised illustration of height standards in CDC 41.005, and clarification that height is to be measured from finished grade. See pages 156-157 of the April 14th draft amendments.
- In response to concern about acronym usage and order, the April 14th draft text amendments now contains a list of acronyms in CDC 02.040 (Acronyms and Abbreviations). See pages 42-43.
- The definitions chapter was expanded to include a new definition for pre-fabricated structures. See pages 2 and 25.
- Re-ordering of the illustrations in CDC 43.040 to better correspond to corresponding text. See pages 168-171.

Additional Revisions

In addition to the revisions described above, staff is proposing additional changes as detailed below:

- In coordination with the ADU Code Amendment Project, remove accessory structure height standards from the definition of Floor Area Ratio (page 15).
- Reconcile CDC Chapters 75 and 99 by removing the pre-application requirement for a Class I Variance, consistent with Ordinance 1622. (Pages 323-324)
- Additional revisions recommended by the City Attorney's office for the purpose of avoiding or removing existing or proposed points of discretion or ambiguity. These include:
 - CDC 02 – Definition of Story – The current definition allows for measurement of the top story to either the ceiling or the roof, which adds discretion and creates uncertainty. Staff recommends measuring to the ceiling, for consistency with how the remaining floors are measured. (Pages 2 and 35)
 - CDC 14.050/15.050/16.050 - Change the standard from "adequate laundry facilities" to "shared" laundry facilities within the context of senior citizen/handicapped housing. This is necessary to remove discretion as the code does not specify how adequacy is to be determined. (Pages 116, 129, and 143)

- CDC 41.020.A – Revise a proposed text insertion by removing the term “steeply” from “steeply sloped lots”. This removes an ambiguity without changing the city’s height standards as it is located within an introductory sentence proposed for inclusion. (Page 160).
- CDC 54.020.B – Rephrasing of a proposed definition for shade trees, consistent with city attorney direction regarding word order and removal of the term “dense foliage” as it inserts discretion and ambiguity. (Pages 176-177)
- CDC 55.025 – Clarification of which residential land uses are exempt from Design Review, by calling out dwellings within the Willamette Neighborhood Mixed Use Transition Zone as the “exception to the exception”. (Page 190)
- CDC 55.100.6.C – Removal of the requirement for litter receptacles for dwelling subject to Design Review, as the code does not contain a clear numeric standard for residential development. Standards regarding their placement (i.e. not obstructing paths or in a right of way) are proposed for retention. (Page 243)
- CDC 85.200.A.14 / B.2.c – To clarify the exception criteria that permits the use of a cul-de-sac, clarify the definition of steep slopes as lands containing a slope of 25% or greater, consistent with limitations on Type I/II lands and other standards for land that is considered unbuildable. (Page 308)

Attachments

1. Memorandum from Edward Trompke of Jordan Ramis to West Linn Planning Commission regarding Clear and Objective Standard Amendments to City Code (April 13, 2023).
2. Memorandum from Marc Butorac, Kittelson & Associates, to West Linn Planning Commission (April 13, 2023).
3. Memorandum from Kate Rogers and Cathy Corliss, MIG-APG, to West Linn Planning Commission (April 13, 2023).
4. Clear and Objective Code Compliance Project – Revised Planning Commission Draft Text Amendments – 04.14.23

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LEGAL MEMORANDUM

TO: West Linn Planning Commission and John Floyd

FROM: Edward H. Trompke

DATE: April 13, 2023

RE: Clear and Objective Standard Amendments to City Code
File No. 50015-36839

Where reference is to the comprehensive plan or other documents that are adopted by the city council, the city code may incorporate all updates, if the code intends it to, such as by saying “as amended from time to time.”

When the code refers to other documents that are not adopted by the city council, the later updates are probably not automatically included in the code, but the version in effect when the code is adopted is included.

The reason (and the reason for the “probable” nature of this) is that legislative power to adopt standards cannot be delegated to other persons or bodies, but the law about this is subject to change from time to time.

As examples, the Oregon Supreme Court has held that a city code that referred to, and incorporated state law applicable to driving under the influence, did not incorporate later changes in the state law adopted by the legislature. And a state agency could not automatically incorporate building code updates from an entity that writes codes. The administrative rule adoption process was required.

But the court has also held that certain amounts of delegation of legislative power may be allowed, if the entity adopting the update is neutral and unbiased. As a result, unless the City desires to be a test case, the better practice is to have council adopt updates into the code from time to time. The State Building code has state law making it applicable in cities so it is a third variety of adopted material (but the state has to adopt the privately-written building codes. They are not automatically included in state law.)

Technical Memorandum

April 13, 2023

Project# 29095.01

To: Darren Wyss, Planning Manager
Planning Department
City of West Linn
22500 Salamo Rd.
West Linn, Oregon 97068

From: Marc Butorac, PE, PTOE, PMP and Karen Swirsky, AICP

RE: West Linn Planning Commission Questions Regarding Oregon's Transportation
Planning Rule and Transportation System Plans

INTRODUCTION

The City of West Linn Planning Department has requested background information and clarification for the Planning Commission on five questions related to the City's Transportation System Plan (TSP) and the need for Traffic Impact Studies, including:

1. What is the Transportation Planning Rule (TPR), and how does it guide transportation planning in Oregon cities?
2. What is a TSP and how does it help the City identify and plan for future needs?
3. How do cities fund and build future needs identified in the TSP?
4. How do Traffic Impact Studies relate to the TSP?
5. How do the TSP and Traffic Impact Studies relate to the Potential Conditions of Approval associated with a Development Application and/or Proposed Zone Change in West Linn?

1. What is the Transportation Planning Rule?

The TPR implements Oregon Administrative Rule (OAR) 660-012-000. The TPR was written to enact Oregon Statewide Planning Goal 12 – Transportation. Goal 12 requires cities, counties and the state to create transportation plans that account for all modes of transportation so people have options for the ways they can access neighborhoods, jobs, goods, recreational area, and services. These transportation plans must look at both the needs of the community's residents, visitors, and people who work here as well as the "through traffic" on our streets and highways.

The TPR provides specific guidance as to what must be included in local planning efforts for transportation in order for the State to approve the plan, as described in the following sections.

2. What is a Transportation System Plan?

The TPR provides detailed directions on how to prepare a TSP that will provide multimodal transportation infrastructure to support growth consistent with the jurisdiction's adopted Comprehensive Plan over a 20-year time horizon.

Per the TPR, a TSP identifies the needs of people driving, riding bikes, taking transit, walking, and “rolling” as well as freight, air, rail, and water transportation. It must plan for the needs of people at all ages and stages in life, those with mobility challenges, and support for the local and statewide economies. In addition, the TPR directs jurisdictions to create transportation plans that conserve energy, minimize adverse social and economic impacts for disadvantaged areas, and protect against transportation-related climate change impacts.

A TSP typically includes the following elements:

- An inventory of existing conditions, including infrastructure for walking, bicycling, transit, motor vehicles, and freight, as well as any air, rail, and water transportation if appropriate; this inventory also includes the number of cars, trucks, bikes and pedestrians using key streets;
- Projections of the future (20-year) needs of the transportation system. The needs analysis is informed by the 20-year volumes on key streets associated with continued growth in population and employment consistent with a comprehensive plan (these volumes are often calculated using a “travel demand model”);
- A list of projects (e.g., roadway connections and intersection improvements needed based on the horizon year modeling in the TSP) and programs to meet those future needs;
- Policies to guide the community’s transportation planning efforts; and,
- A financial plan identifying how needed transportation projects and programs can be funded over time.

The TSP is formally adopted by the community as an element of its Comprehensive Plan and acknowledged by the state. The TSP is meant to be updated periodically to reflect changing needs within the community. Typically, TSPs are updated every 5 – 7 years, depending on the jurisdiction.

The Department of Land Conservation and Development (DLCD) updated the TPR in 2022 to reflect the Climate Friendly and Equitable Communities (CFEC) rulemaking. These rule changes will have an impact on the city’s next TSP update is completed as it relates to how the multi-modal system is inventoried, how projects are prioritized, how the community is engaged, and how underserved populations are impacted. The rules also require consistency with the Metro Regional Transportation Plan (RTP) performance measures that document how the region will achieve green house gas reduction targets; it also requires that any new project that adds capacity for vehicles will require additional review.

3. How Do Cities Fund and Build Future Transportation Needs?

Each TSP must include a section that addresses the requirements for a transportation funding strategy – in other words, how are the needed projects going to get built and programs accomplished?

Per OAR 660-012-0040, any jurisdiction with a population greater than 2,500 persons must prepare a detailed financial assessment of the TSP's list of transportation projects/programs. In general terms, this financial assessment:

- Discusses existing and anticipated funding mechanisms and the ability of these mechanisms to finance future projects/programs.
- Prioritizes and identifies the general timing of each multimodal transportation project/program against the projected funding.

This assessment involves the identification of current and historical transportation revenue sources, current and historical transportation expenditures, and a projection of 20-year funding and expenditure forecasts.

Typically, a jurisdiction's funding sources will include dollars from the state, general fund, franchise fees, system development charges, urban renewal or other tax increment financing, grants, and developer exactions. Some of these sources are more difficult to project into the future, such as developer exactions, which are often linked to land use development. It is common for there to be a significant funding gap between identified sources of revenue and the amount needed to meet a 20-year list of needed improvements.

For cities within MPOs, the TPR requires that jurisdictions create a "financially constrained" project list that identifies the projects for which it is reasonable to expect funding to be available within the 20-year planning horizon. This can include some more speculative funding sources such as a General Obligation bond or a gas tax. In developing the financially constrained list of projects/programs, the following methods are used:

- Prioritize the list of projects,
- Understand the types and levels of funding reasonably available over the course of the planning period,
- Match the type of project or program with revenue sources likely to be available, and
- Match the timing for receipt of revenues with the timing for project or program and construction and implementation.

However, it is very common for a jurisdiction's project list to include many projects for which no funding source is currently identified. This is called the "unconstrained" project list. Many unconstrained projects are opportunistic – they are on the project list because they are important to the jurisdiction's transportation system, but their need is linked to future land use (new development or increased density resulting from redevelopment), often in specific areas of the community.

When a land use development is proposed that would trigger the need for the new facility, all or a portion of the project can be conditioned on land use approvals if it can be demonstrated that there

isn't sufficient vehicular capacity to accommodate the proposed land use action within the existing transportation system. This is a commonly used tool for new infrastructure such as streets, sidewalks, bikeways, and significant intersection improvements that are identified as needed projects in the TSP.

The inclusion of both the opportunistic and financially constrained transportation projects also provides cities with the ability to pursue national and federal grants as new sources and opportunities arise. Cities can rely on the list of financially constrained projects within the TSP when drafting conditions of approval/exaction requirements of development. If a project is identified on the unfunded list, a city or a developer can propose a TSP amendment to add it to the list of funded projects. This also allows for credits to be given to developers (such as system development charges) for funding and constructing the project.

4. How Do Traffic Impact Studies Relate to the TSP?

The TSP predicts the need for **new** or **enhanced** infrastructure based on a community-wide analysis of projected growth and resulting needs and projects envisioned over the long-term (i.e., as outlined in the second question of this memorandum).

Traffic impact studies measure the effect of a new land use development on the **existing** transportation system and also considers planned transportation system changes that have been designed and fully funded for construction in the vicinity of the proposed development. For example, a traffic impact study for a large new commercial development on the corner of two arterials may indicate that the new use would trigger the need for an additional turn lane because the project would add a significant number of new motor vehicle trips at certain times of the day, generating delay beyond the jurisdiction's established intersection performance thresholds. In many jurisdictions, the potential impacts of a development on other modes (walking, bicycling, and transit) are also measured. In most jurisdictions, a finding of an impact on the performance of the transportation system could result in an exaction imposed on the developer. Ultimately, the traffic impact study ensures that the access to/from the proposed development can operate in a safe and efficient manner and related improvements comply with the TSP.

When a traffic impact study is required (based on anticipated trip generation), staff needs to provide findings that the buildout of the development complies with the TSP and with the requirements of the local development code as well as other jurisdictional policies (e.g., ODOT, if it is demonstrated that the development would have impacts on a state facility). In addition, the traffic impact study may identify additional improvements to ensure the access and immediately surrounding transportation system can continue to operate acceptably.

In instances when a traffic impact study is not required (based on anticipated trip generation being less than 250 daily trips or other code criteria), staff need to ensure that the development complies with the TSP. A development that connects, widens, or extends streets consistent with the TSP does not require a traffic impact study as these changes have already been identified, evaluated, and adopted into the TSP.

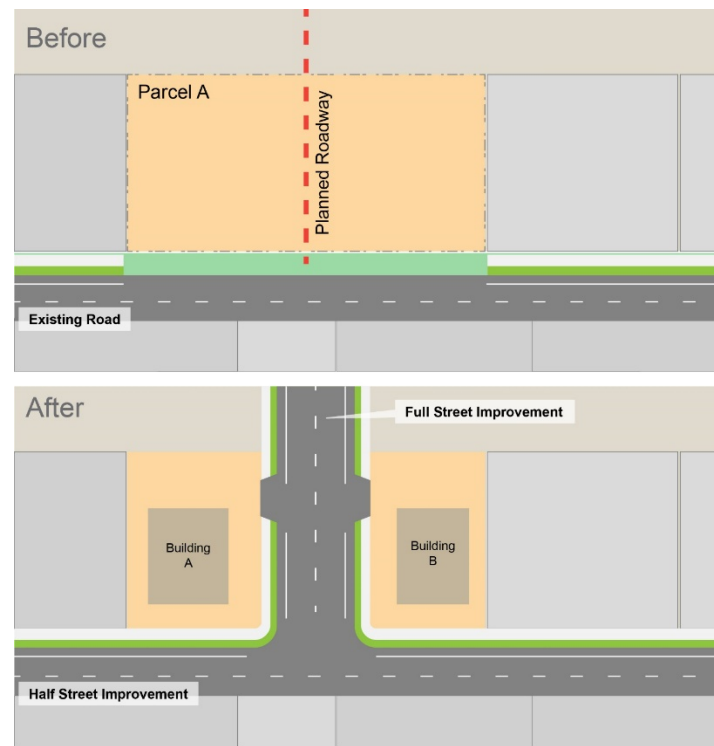
Regardless of whether a finding of significance is determined, any new development is assessed a System Development Charge (SDC) to help fund the future needs of the City, as identified in the TSP.

Traffic impact studies also can measure the effect of an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including zoning map) on both the existing transportation system and the future fiscally constrained system either at the horizon year of the TSP or 15 years into the future (whichever is longer). If the impacts of the proposed amendment result in a significant affect as defined under OAR 660-012-0060, the applicant may be required to provide additional improvements to the transportation system to mitigate the effect. The TPR has a number of other tools that agencies can use (besides adding vehicular capacity) to address significant effects associated with a proposed amendment.

5. How Does the TSP and Traffic Impact Study relate to the Potential Conditions of Approval associated with a Development Application and/or Proposed Zone Change in West Linn?

Development Applications and/or Proposed Zone Changes in the City of West Linn are reviewed under the City of West Linn Municipal Code and Community Development Code which rely on the City's adopted 2016 Transportation System Plan. An applicant is responsible for funding and preparing a Traffic Impact Study (when required by the code) to identify operational and/or safety impacts in the vicinity of the site and what, if any, mitigation is required. The study also identifies whether the application complies with the code and is consistent with the TSP. The City must draft findings for how the proposal complies with both the applicable code criteria and the TSP. In the case of amendments, a TPR evaluation must be prepared to identify how the proposal is consistent with the adopted performance standards for the facility. As a result, planned transportation infrastructure in the TSP that is adjacent to and/or traverses a subject site needs to be accounted for and typically constructed as part of the proposed development and/or land use action.

The exhibit below demonstrates how roadway improvements should be typically considered, conditioned, and constructed as part of a proposed development project.



The undeveloped parcel shown above (in the “Before” condition) abuts an existing roadway without sidewalks or bike lanes. The development site is bisected by a street shown in the adopted TSP as a needed project. As part of the application, the City can both ask for the construction of the street within and the half street improvements along the existing street frontage as these are consistent with the TSP and with the development code requirements.

In the example above, changes to the existing street frontage would need to include sidewalks and bike lanes and potentially vehicular lanes, based on the street’s functional classification and cross-section requirements. Second, the new street would need to include the full right-of-way dedication and the construction of all of the street elements consistent with the TSP requirements. The "After" state in the exhibit illustrates the improvements that would be conditioned and constructed to ensure that the development is consistent with the TSP.

Recent amendments to the TPR create new rules for evaluating plan amendments and zone changes within designated Metro 2040 centers. Within Metro 2040 centers, cities are now exempt from the requirements of OAR 660-12-0060 and instead apply the requirements of OAR 660-012-0325. West Linn has two Metro 2040 centers. One along Hwy 43 - Willamette Drive near the I-205 interchange and the other along Willamette Falls Drive and 10th Street. In these areas, the primary requirement is a multimodal transportation gap summary. The summary must be completed as part of a TSP update or as a separate adopted document in coordination with impacted transportation facility and service providers.

memo

to West Linn Planning Commission
from Kate Rogers and Cathy Corliss, MIG|APG
re West Linn Clear and Objective Code Compliance Project
Public Works Standards Comparison Memo
date 4/13/2023

This memorandum responds to a request by the West Linn Planning Commission at their March 1, 2023 work session regarding the Clear and Objective Code Compliance Project. At the meeting, Planning Commissioners expressed concern about removing public improvement regulations from the Community Development Code (CDC) in favor of references to the City's Public Works Design Standards.

There are a number of places in the current CDC where the City Engineer is given discretion over decisions regarding public facilities (e.g., "if approved by the City Engineer"). Under state statute, this type of discretionary language is not permitted when applied to housing. The project team's proposed approach has been to replace the discretionary language with clear and objective references to the Public Works Design Standards. The City Engineer currently uses the Public Works Design Standards to assess a proposal's compliance with City requirements; therefore, referencing these standards is consistent with current practice.

Per the Planning Commission's request, this memo lists all instances in the proposed amendment package where CDC regulations are replaced by references to the Public Works Design Standards. The table below identifies the CDC section, the existing language, and the proposed revised standard. Existing code language that is discretionary or not adequately clear or specific is **highlighted in yellow**. Added text in the revised standard is shown in red underline.

CDC Section	Existing Standard	Revised Standard (as proposed)
<p>Ch. 36 Manufactured Homes</p> <p>36.030(D)(5)(b-c)</p> <p>Manufactured Dwelling Parks Standards</p>	<p>b. Streets shall be paved with cement or asphaltic concrete, and designed and constructed to adequately support traffic loads and provide adequate drainage, all as approved by the City Engineer.</p> <p>c. Each manufactured home space within the park shall have direct access to a park street or to a public residential street. The driveway shall be an unobstructed area, not less than 10 feet in width, and shall be constructed of concrete or asphaltic concrete and well-drained, and all as approved by the City Engineer.</p>	<p>b. Streets shall be paved with cement or asphaltic concrete, and designed and constructed to adequately support traffic loads and provide adequate drainage, <u>consistent with the West Linn Public Works Design Standards and ORS 446.095.</u></p> <p>c. Each manufactured dwelling space within the park shall have direct access to a park street or to a public residential street. The driveway shall be an unobstructed area, not less than 10 feet in width, and shall be constructed of concrete or asphaltic concrete and well-drained, <u>consistent with the West Linn Public Works Design Standards.</u></p>
<p>36.030(D)(6-8)</p> <p>Manufactured Dwelling Parks Standards</p>	<p>6. <u>Storm drainage.</u> All spaces shall be provided with adequate storm drainage and connected to the storm drainage system. Where a public street is to be dedicated or improved by the applicant, such drainage systems shall be designed and constructed according to City code standards and specifications.</p> <p>7. <u>Sewage disposal.</u> All spaces shall be served by the sanitary sewer system of the City. Such sewer systems shall be designed and constructed according to City code standards and specifications.</p> <p>8. <u>Water supply.</u> All spaces shall be served by the water system of the City. Such water supply systems shall be designed and constructed according to City code standards and specifications.</p>	<p>6. <u>Storm drainage.</u> All spaces shall be provided with adequate storm drainage and connected to the storm drainage system. Where a public street is to be dedicated or improved by the applicant, such drainage systems shall be designed and constructed according to <u>the West Linn Public Works Design Standards.</u></p> <p>7. <u>Sewage disposal.</u> All spaces shall be served by the sanitary sewer system of the City. Such sewer systems shall be designed and constructed according to <u>the West Linn Public Works Design Standards.</u></p> <p>8. <u>Water supply.</u> All spaces shall be served by the water system of the City. Such water supply systems shall be designed and constructed according to <u>the West Linn Public Works Design Standards.</u></p>

CDC Section	Existing Standard	Revised Standard (as proposed)
Ch. 46 Off-Street Parking, Loading and Reservoir Areas 46.150(A)(12) Design and Improvement Standards	Off-street parking and loading areas shall be drained in accordance <u>with plans and specifications approved by the City Engineer</u> . Storm drainage at commercial sites may also have to be collected to treat oils and other residue.	Off-street parking and loading areas shall be drained in accordance <u>with City of West Linn Public Works Design Standards</u> . Storm drainage at commercial sites may also have to be collected to treat oils and other residue.
Ch. 48 Access, Egress and Circulation 48.025(B)(3) Access Control	<u>Access options</u> . When vehicle access is required for development (i.e., for off-street parking, delivery, service, drive-through facilities, etc.), access shall be provided by one of the following methods (<u>planned access shall be consistent with adopted public works standards and TSP</u>). These methods are “options” as approved by the City Engineer.	<u>Access options</u> . When vehicle access is required for development (i.e., for off-street parking, delivery, service, drive-through facilities, etc.), access shall be provided <u>from a public street adjacent to the development lot or parcel. Street accesses shall comply with access spacing standards in subsection (B)(6) of this section, the West Linn Public Works Design Standards, and TSP. As an alternative, the applicant may request alternative access provisions listed below as Option 1 and Option 2, subject to approval by the City Engineer through a discretionary process.</u>
48.030(D) Minimum Vehicular Requirements for Residential Uses	Access to five or more single-family homes shall be by a street built to <u>full construction code standards</u> . All streets shall be public. This full street provision may only be waived by variance.	Access to five or more single-family homes shall be by a street built to <u>City of West Linn standards, consistent with the TSP (Tables 26 through 30 and Exhibits 6 through 9) and the Public Works Design Standards</u> . All streets shall be public. This full street provision may only be waived by variance.

CDC Section	Existing Standard	Revised Standard (as proposed)
48.060(G) Width and Location of Curb Cuts and Access Separation Requirements	Adequate line of sight pursuant to engineering standards should be afforded at each driveway or accessway.	<u>Clear vision areas shall be maintained, pursuant to CDC Chapter 42, and required line of sight shall be provided at each driveway or accessway, pursuant to the West Linn Public Works Design Standards.</u>
Ch. 55 Design Review 55.105(M)(1)(b) Public Facilities	55.100(I)(1) [...] Sufficient right-of-way and slope easement shall be dedicated to accommodate all abutting streets to be improved to the City's Improvement Standards and Specifications. The City Engineer shall determine the appropriate level of street and traffic control improvements to be required, including any off-site street and traffic control improvements, based upon the transportation analysis submitted.	55.105(M)(1)(b) Sufficient right-of-way and slope easement shall be dedicated to accommodate all abutting streets to be improved <u>to City standards, in accordance with the West Linn Public Works Design Standards.</u>
55.105(M)(1)(c) Public Facilities	55.100(I)(1) [...] The realignment or redesign of roads shall consider how the proposal meets accepted engineering standards, enhances public safety, and favorably relates to adjacent lands and land uses. Consideration should also be given to selecting an alignment or design that minimizes or avoids hazard areas and loss of significant natural features (drainageways, wetlands, heavily forested areas, etc.) unless site mitigation can clearly produce a superior landscape in terms of shape, grades, and reforestation, and is fully consistent with applicable code restrictions regarding resource areas.	55.105(M)(1)(c) The realignment or redesign of roads shall <u>be consistent with West Linn Public Works Design Standards and shall be</u> consistent with applicable code restrictions regarding resource areas, <u>pursuant to CDC Chapter 27 Flood Management Areas, Chapter 28 Willamette and Tualatin River Protection, and Chapter 32 Water Resource Area Protection.</u>
Ch. 85 Land Divisions – General Provisions	85.200(A)(1) [...] Internal streets are the responsibility of the developer. All streets bordering the development site are to be developed by the	85.200(A)(6)(a) <u>Streets that are</u> internal <u>to the land division site</u> are the responsibility of the developer. All streets bordering the development site are to be

CDC Section	Existing Standard	Revised Standard (as proposed)
85.200(A)(6)(a) Streets	developer with, typically, half-street improvements or to City standards prescribed by the City Engineer. Additional travel lanes may be required to be consistent with adjacent road widths or to be consistent with the adopted Transportation System Plan (TSP) and any adopted updated plans.	developed by the developer with, typically, half-street improvements to <u>the City of West Linn Public Works Design Standards</u> . Additional travel lanes may be required to be consistent with adjacent road widths or to be consistent with the adopted Transportation System Plan (TSP), <u>Tables 26 through 30 and Exhibits 6 through 9.</u>
85.200(B)(2)(b) Blocks and Lots	Designs of proposed intersections shall demonstrate adequate sight distances to the City Engineer's specifications.	Designs of proposed intersections shall demonstrate <u>sight distances consistent with the West Linn Public Works Design Standards.</u>
85.200(E)(3) Grading	The proposed grading shall be the minimum grading necessary to meet roadway standards, and to create appropriate building sites , considering maximum allowed driveway grades.	The proposed grading shall be the minimum grading necessary to meet roadway standards, <u>pursuant to the West Linn Public Works Design Standards</u> , and to create <u>buildable sites</u> , considering maximum allowed driveway grades.
85.200(F)(1)(a) Water	Adequate location and sizing of the water lines.	Location and sizing of the water lines <u>consistent with the Water System Master Plan and West Linn Public Works Design Standards.</u>
85.200(F)(1)(b) Water	For all non-single-family developments, there shall be a demonstration of adequate fire flow to serve the site.	For all non-single-family developments, there shall be a demonstration of adequate fire flow to serve the site, <u>as demonstrated by consistency with West Linn Public Works Design Standards.</u>
85.200(I) Utility Easements	<u>Utility easements.</u> Subdivisions and partitions shall establish utility easements to accommodate the required service providers as determined by the City Engineer.	I. Utility easements. Subdivisions and partitions shall establish utility easements to accommodate the required service providers <u>as specified in the West Linn Public Works Design Standards.</u>

CDC Section	Existing Standard	Revised Standard (as proposed)
Ch. 92 Required Improvements 92.010(A)(1) Streets within subdivisions	All streets within a subdivision, including alleys, shall be graded for the full right-of-way width and improved to the City's permanent improvement standards and specifications which include sidewalks and bicycle lanes , unless the decision-making authority makes the following findings:	All streets within a subdivision, including alleys, shall be graded for the full right-of-way width and improved <u>in accordance with the West Linn Public Works Design Standards and with the street cross sections in Exhibits 6-9 of the 2016 Transportation System Plan</u> , unless <u>the applicant requests an exception as part of a discretionary review and</u> the decision-making authority makes the following findings:
92.010(C) Streets	Local and minor collector streets within the rights-of-way abutting a subdivision shall be graded for the full right-of-way width and approved to the City's permanent improvement standards and specifications. The City Engineer shall review the need for street improvements and shall specify whether full street or partial street improvements shall be required. The City Engineer shall also specify the extent of storm drainage improvements required. The City Engineer shall be guided by the purpose of the City's systems development charge program in determining the extent of improvements which are the responsibility of the subdivider.	Streets within the rights-of-way abutting a subdivision shall: <ul style="list-style-type: none"> a. Be graded for the full right-of-way width and approved <u>in accordance with the West Linn Public Works Design Standards;</u> b. <u>Install pedestrian and bicycle infrastructure and two full travel lanes adjacent to the subdivision in accordance with CDC 85.200.A(3);</u> c. <u>Install required stormwater and utility facilities adjacent to the subdivision in accordance with the West Linn Public Works Design Standards; and</u> d. <u>Comply with adopted West Linn Public Works Design Standards.</u>
92.010(F) Sanitary sewers	<u>Sanitary sewers.</u> Sanitary sewers shall be installed to City standards to serve the subdivision and to connect the subdivision to existing mains.	<u>Sanitary sewers.</u> Sanitary sewers shall be installed <u>in accordance with the West Linn Public Works Design Standards</u> to serve the subdivision and to connect the subdivision to existing mains.